

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-cv-6563 (LJL)

**PLAINTIFFS' FIRST SET OF DOCUMENT REQUESTS
TO DEFENDANT RUDOLPH W. GIULIANI**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure ("FRCP"), Plaintiffs Ruby Freeman and Wandrea ArShaye ("Shaye") Moss hereby request that Defendant Rudolph W. Giuliani ("You") produce documents responsive to the requests below in compliance with the Court's Case Management Plan and Scheduling Order in the above captioned case. ECF. No. 53. This request for documents, including each individual Request for Documents (collectively, the "Requests"), shall be read and interpreted in accordance with the definitions and instructions set forth below.

GENERAL DEFINITIONS

Plaintiffs incorporate by reference all the instructions, definitions, and rules contained in the Federal Rules of Civil Procedure ("FRCP") and for purposes of this Subpoena, the following definitions shall apply:

1. Unless words or terms have been given a specific definition herein, each word or term used herein shall be given its usual and customary dictionary definition.
2. The terms defined herein should be construed broadly to the fullest extent of their meaning in a good faith effort to comply with the FRCP.

3. “And” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the Requests all information that might otherwise be construed to be outside of their scope.

4. “You,” “Your,” or “Yours” refers to Rudolph W. Giuliani and includes any persons or entities acting for him or on his behalf, including but not limited to all representatives, servants, agents, employees, officers, affiliates, subsidiaries, parent companies, third parties, as well as any entities over which Defendant Rudolph W. Giuliani has control.

5. “Communication” means, in addition to its customary and usual meaning, every contact of any nature, whether documentary, electronic, written or oral, formal or informal, at any time or place and under any circumstances whatsoever whereby information of any nature is transmitted or transferred by any means, including, but not limited to letters, memoranda, reports, emails, text messages, instant messages, social media, telegrams, invoices, telephone conversations, voicemail messages, audio recordings, face-to-face meetings and conversations, or any other form of communication, and any Document relating to such contact, including but not limited to correspondence, memoranda, notes or logs of telephone conversations, e-mail, electronic chats, text messages on any platform, instant messages, direct or private messages, correspondence in “meet ups” or chat rooms, and all other correspondence on Social Media. Without limiting the foregoing in any manner, commenting as well as any act of expression that is not directed at a specific person, or otherwise may not be intended to provoke a response (such as a social media posting, “likes,” “shares,” or any other form of reacting to another’s use of Social Media), are forms of communication.

6. “Document” or “Documents” means documents broadly defined in Rule 34 of the FRCP and includes (i) papers of all kinds, including, but not limited to, originals and copies,

however made, of letters, memoranda, hand-written notes, notebooks, work-pads, messages, agreements, rough drafts, drawings, sketches, pictures, posters, pamphlets, publications, news articles, advertisements, sales literature, brochures, announcements, bills, receipts, bank checks, credit card statements, and (ii) non-paper information of all kinds, including but not limited to, any computer generated or electronic data such as digital videos, digital photographs, audio recordings, podcasts, Internet files (including “bookmarks” and browser history), word documents, note taken electronically, online articles and publications, website content, electronic mail (e-mail), electronic chats, instant messages, text messages, uploads, posts, status updates, comments, “likes”, “shares”, direct messages, all Social Media activity, or any other use of ephemeral communications services or Social Media, and (iii) any other writings, records, or tangible objects produced or reproduced mechanically, electrically, electronically, photographically, or chemically. Without limiting the foregoing in any way, every Communication is also a Document.

7. “Relating to” means “concerning,” “referring to,” “describing,” “evidencing,” or “constituting.”

SPECIFIC DEFINITIONS

1. “Plaintiffs” means Ruby Freeman and Wandrea’ “Shaye” Moss, the plaintiffs in the above-captioned litigation.

2. The word “evidence” includes but is not limited to information provided to You, whether orally or in writing, by any individual or source.

3. “Homestead Tax Exemption” refers to a deduced property tax rate or tax credit for an individual’s primary residential property that meets state specific standards.

4. “Declaration” refers to Your Declaration in Opposition to Plaintiff’s Motion for Summary Judgment in *Freeman v. Giuliani*, No. 24-CV-06563-LJL (S.D.N.Y. Oct. 16, 2024), ECF. No. 42.

5. Your “Rule 56.1 Statement” refers to Your Local Rule 56.1 Statement in Support of Cross-Motion for Summary Judgment filed in *Freeman v. Giuliani*, No. 24-CV-06563-LJL (S.D.N.Y. Oct. 16, 2024), ECF. No. 46.

6. Your “Declaration of Domicile” refers to the Declaration of Domicile attached as Exhibit H to Your Declaration. *See Freeman v. Giuliani*, No. 24-CV-06563-LJL (S.D.N.Y. Oct. 16, 2024), ECF. No. 42-8.

7. “New York Co-op” refers to the Co-op at 45 E 66th Street, Apt. 10W, New York, NY 10065.

8. “Palm Beach Condo” refers to the condominium apartment at 315 South Lake Drive, Unit 5D, Palm Beach, Florida.

9. “Your Businesses” refers to Giuliani and Company, LLC; Giuliani Communications, LLC; Giuliani Group, LLC; Giuliani Partners, LLC; Giuliani Security and Safety, LLC; Rudolph W. Giuliani, PLLC; and WorldCapital Payroll Corp.

INSTRUCTIONS

1. Unless otherwise specified, the relevant time period for the requests is January 1, 2020 through the present.

2. Your responses to the following Requests shall be based on all knowledge and information (whether or not hearsay or admissible) in Your possession, custody, or control.

3. Produce all responsive documents in Your possession, custody, or control, regardless of whether such documents are possessed directly by You or persons under Your

control, including Your agents, employees, representatives, or attorneys, or their agents, employees, or representatives.

4. If no responsive documents exist for any particular requests, specifically state that no responsive documents exist.

5. If any responsive document was, but is no longer, in Your possession, custody, or control, state the whereabouts of such document when last in Your possession, custody or control, state the date and manner of its disposition, and identify its last known custodian.

6. Certify that Your production is complete and correct in accordance with specifications of the attached Certification that Response is Complete and Correct form provided as Exhibit 1.

7. All documents shall be produced in electronic form and shall include related metadata. Produce in TIFF or native format (i.e., Word documents as .DOC or .DOCX files, Outlook emails as .PST files, Excel spreadsheets as .XLS or .XLSX files, Adobe PDF documents as .PDF files). For all forms of electronically stored information, ensure that electronically stored information is provided in unencrypted form and free of password protection.

8. Any alteration of a responsive document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications, and other versions of a document, is a responsive document in its own right and must be produced.

9. In instances where two or more exact duplicates of any document exist, the most legible copy shall be produced.

10. If You have withheld from production responsive documents or tangible things on the basis that You assert a claim of privilege as to that document or thing, You shall prepare a list of withheld documents and things that lists the following information for each such document or thing, or part thereof, withheld on such a basis:

- a. the type of document, e.g., letter or memorandum;
- b. the general subject matter of the document;
- c. the date of the document;
- d. such other information as is sufficient to identify the document for a subpoena duces tecum, including, where appropriate, the author of the document, the addressees of the document, and any other recipients shown in the document, and, where not apparent, the relationship of the author, addressees, and recipients to each other;
- e. the nature and the basis for the claim of privilege; and
- f. sufficient additional information about the document as is necessary to justify Your claim of privilege.

DOCUMENTS TO BE PRODUCED

DOCUMENT REQUEST NO. 1:

All Documents and Communications relating to any Homestead Tax Exemptions or credits in connection with the Palm Beach Condo, the New York Co-op, or any other real estate You own.

DOCUMENT REQUEST NO. 2:

All Documents and Communications relating to Your travel and lodging, including all Communications relating to those subjects with Maria Ryan, Ted Goodman, Vanessa Fenderson,

Michael Ragusa, Ryan Medrano, or anyone who has coordinated, booked, or handled travel and related logistics for You, for the period beginning January 1, 2020 through the present.

DOCUMENT REQUEST NO. 3:

All credit card statements, charges, reimbursements, itineraries, and tickets, relating to airline travel, train travel, car rental, and hotel stays for travel between January 1, 2020 and the present.

DOCUMENT REQUEST NO. 4:

All physical or electronic calendars or schedules kept by You or on Your behalf between January 1, 2020 and the present.

DOCUMENT REQUEST NO. 5:

All Documents and Communications relating to any driver's license and any other government-issued licenses or permits You have held since January 1, 2024.

DOCUMENT REQUEST NO. 6:

Documents sufficient to show all addresses listed on any statements for Your bank accounts, credit cards, safe deposit boxes, brokerage accounts, cable service, internet service, phone service, and cell phone service from January 1, 2020 to the present.

DOCUMENT REQUEST NO. 7:

Documents sufficient to show all addresses on record with any state or federal tax authority, the U.S. Social Security Administration, the U.S. Department of State, the United States Postal Service (including any temporary or permanent mail forwarding requests), and any other state or federal agency, including any changes made to such addresses between January 1, 2020 and the present.

DOCUMENT REQUEST NO. 8:

Documents sufficient to show the address listed on all monthly statements, invoices, or notices for Your Medicare coverage, Social Security, health insurance coverage, and life insurance coverage from January 1, 2020 through the present.

DOCUMENT REQUEST NO. 9:

All statements, invoices, order confirmations, renewal notices for all magazine and newspapers delivered to You at any location between January 1, 2024 and the present.

DOCUMENT REQUEST NO. 10:

Documents sufficient to show the delivery address for all medical prescriptions or dietary supplements delivered to You at any address between January 1, 2024 and the present.

DOCUMENT REQUEST NO. 11:

All Documents and Communications relating to Your use, transportation, maintenance, storage, registration, and insurance of any automobile owned by You.

DOCUMENT REQUEST NO. 12:

All Documents and Communications relating to selling or renting the Palm Beach Condo.

DOCUMENT REQUEST NO. 13:

All Documents and Communications relating to Your intentions to maintain or establish a permanent residence at any location.

DOCUMENT REQUEST NO. 14:

All Documents and Communications relating to the nature of Your use and occupancy of the Palm Beach Condo as a permanent home or a vacation/second home.

DOCUMENT REQUEST NO. 15:

All Documents and Communications relating to the purposes of, and travel and lodging

arrangements for Your time spent in New York, New Hampshire, Wisconsin, Illinois, Texas, France, and England, between February 7, 2024 and August 8, 2024.

DOCUMENT REQUEST NO. 16:

Documents showing all expenses and reimbursements for or advancements of expenses incurred for travel, lodging, food, and leisure while You were in New York, New Hampshire, Wisconsin, Illinois, Texas, France, and England, between February 7, 2024 and August 8, 2024.

DOCUMENT REQUEST NO. 17:

Documents and Communications sufficient to show the location of Your passport, birth certificate, will, trust documents, divorce records, personal and family heirlooms, and sports memorabilia at all times from January 1, 2020 through the present.

DOCUMENT REQUEST NO. 18:

All Documents and Communications relating to updating or changing Your address with any person, business, government entity, subscription service, or other contact.

DOCUMENT REQUEST NO. 19:

Documents sufficient to show the names, affiliations, and office addresses of all medical, financial, and legal professionals You have consulted between January 1, 2020 and the present.

DOCUMENT REQUEST NO. 20:

Documents or Communications sufficient to show where You have spent the months of May through August for the years between 2002 and 2023.

DOCUMENT REQUEST NO. 21:

Documents sufficient to show the address where any paychecks or payments to You or Your Businesses were mailed prior to August 9, 2024.

DOCUMENT REQUEST NO. 22:

All Documents and Communications on which You intend to rely to support Your contention that You established a homestead at the Palm Beach Condo within the meaning of article X, section 4 of the Florida Constitution.

DOCUMENT REQUEST NO. 23:

All Documents and Communications referenced directly or indirectly and/or on which You relied when answering Plaintiffs' Requests for Admissions and Interrogatories.

DOCUMENT REQUEST NO. 24:

All Documents and Communications referenced directly or indirectly and/or on which You relied to file Your Declaration, Rule 56.1 Statement, and/or Declaration of Domicile.

DOCUMENT REQUEST NO. 25:

All Documents and Communications relating to Your preservation of relevant evidence in this action.

EXHIBIT 1

CERTIFICATION THAT RESPONSE IS CORRECT AND COMPLETE

I, _____, certify as follows:

1. The enclosed production of Documents and Communications were prepared and assembled under my personal supervision;
2. The Documents and Communications contained in this production to the Subpoena are authentic, genuine and what they purport to be;
3. Attached is a true and accurate record of all persons who prepared and assembled any productions and responses to the Subpoena, all persons under whose personal supervision the preparation and assembly of productions and responses to the Subpoena occurred, and all persons able competently to testify: (a) that such productions and responses are complete and correct to the best of such person's knowledge and belief; and (b) that any Documents produced are authentic, genuine and what they purport to be; and
4. Attached is a true and accurate statement of those requests under the Subpoena as to which no responsive Documents were located in the course of the aforementioned search.

Signature: _____

Date: _____

Printed Name: _____

Address, e-mail and telephone number: _____
